



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

August 12, 2010

LU-9J

**CERTIFIED MAIL 7001 0320 0006 0192 7392**  
**RETURN RECEIPT REQUESTED**

Michael J. Pinto  
Legacy Site Services  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341-2528

Re: Administrative Order on Consent  
U.S. EPA ID NO. MID 005 363 114  
U.S. EPA Docket No. V-W-89-R-45

Dear Mr. Pinto,

Thank you for submitting the Corrective Measures Study Report (May 2010). This letter requests some additional information regarding the Study. Please note that I will likely make further inquiries regarding the document.

- 1) Groundwater Alternative 1 - Please provide an estimate of the time required for the operation of the IRM to reach the Part 201 media clean-up standards in Area 17, including standards for the DNAPL, DNAPL dissolved-phase plume(s), chloroform plume, and any other plumes being treated by the IRM.

The estimate should be based on: Site hydrogeology, an assessment of the total DNAPL volume based upon its footprint and thickness across the footprint, an assessment of the current physical stability of the DNAPL under the natural and anthropogenic hydraulic gradients, and a summary of past DNAPL removal rates as well as a projection of the future DNAPL removal rates. If contaminant decay/degradation is an important process in the evolution of the dissolved contaminant plume, or other plumes, the geochemistry of the decay/degradation process(es) should also be described. Additionally, an assessment of how the DNAPL weathers over time (as constituents dissolve, volatilize, degrade, sorb, and become removed) could be needed for this estimate.

Please provide the estimate by September 17, 2010.

- 2) DNAPL Extent Figure The *RFI* Figure 2.1 appears to be the only figure defining the areal footprint of the DNAPL extent. It appears that the demarcation around SWMUs 17, 4, 6 and 11 is "Area 17." If there is a

better DNAPL extent figure in another document, please let me know. Otherwise, a new DNAPL extent figure should be prepared for evaluation of the Alternatives which may also be used in the Statement of Basis.

Please submit the figure by September 10, 2010.

- 3) Area 17 IRM Monitoring Wells - As discussed, current and ongoing monitoring well data are needed to monitor the effectiveness of the Area 17 IRM collection system. Please sample MW-025, IRM-MW-1, IRM-MW-2 and IRM-MW-03 for VOCs and SVOCs. For the near-term, and until such time as data indicate a reduced frequency monitoring frequency, these wells should be sampled quarterly, beginning this quarter.

If you have any questions, please contact me at (312) 886-3020.

Sincerely,



Carolyn Bury  
Project Manager  
Corrective Action Section 2  
Remediation and Reuse Branch